

# ASEL Submission, 2023: v4.0

To Whom It May Concern:

Thank you for the opportunity to provide feedback to this latest amendment of the Australian Standards for Exporting Livestock.

Sincerely

Dr Lynn Simpson  
BSc, BVMS, MVSc, Ex AAV

## Update Standard 4- Sea transport

- 1) Q; When an accredited veterinarian (AAV) or stockperson must accompany a voyage.

4.1.8 An accredited stockperson who is employed or contracted by the exporter must be appointed to accompany each consignment for the duration of the entire voyage as per ASEL's definition. The accredited stockperson must not be a member of the vessel's crew.

Rationale: Maritime language has its own definitions that do not correlate with ASEL's definitions. Many seafarers, especially locum captains or Chief officers who often have a say as to when ship members even Supernumerary ones such as an AAV or Stockperson sign off and leave a vessel will not necessarily understand that voyage length is not to do with sailing days. This has historically caused problems for AAV's and Stockpeople determining their sign off time. They are not uncommonly bullied by ship officers, exporters/ agents to leave early based on fearmongering of limited last minute repatriation flight availability. Especially if the voyage has gone poorly and others do not want the AAV/ Stockpersons to count the full mortality/ morbidity balance. Or just as a cost saving effort.

4.1.9 An AAV must accompany each consignment of livestock for the duration of the entire voyage as per ASEL's definition.

Rationale: If animals are to be sent to an unnatural, physically hostile environment in the form of being at sea on a ship with only minimally trained Stockpeople, however competent, their needs during times of illness/ injury are not reliably covered and this has been a tremendous animal welfare issue for as long as the trade has been going.

Whilst many Stockpeople are extremely competent in stock handling and management, their 4-day course based out of a hotel is not comparable to a 6 year Veterinary medicine and Surgery degree. Stockpeople are not sufficiently trained to undertake post mortem examinations, analyse findings and determine consequential actions. I.e. determining risk of

spread of some diseases and treatment requirements or possible zoonotic consequences and any mitigating measures that may be required including possible food security. Past personal experience has proven that it is not reliable to send images, questions or data back to shore for assistance as either it is not available due to time of day, day of week ability for the shore based vet to understand the full situation as they are very different to land based scenarios, or more troubling is when the company simply refuses to respond (as I have had- this not only pissed me off but also the Captain as even he could not coax a response from the company to an issue that could well have been a rejection had the importing authorities looked more closely) . Realtime advice with the actual case in front of a qualified person is required for the best outcome for the animals and crew as well as determining the possible potential risk to food security upon discharge. These scenarios if managed poorly have the ability to cause major political, media, and health concerns to individuals, importing countries and the Australian governments. Examples may include having animals with Bovine papular stomatitis lesions being confused as Foot and mouth, especially in current times with so many of our neighbouring countries having endemic foot and mouth disease.

Australia commonly is the source of International concern regarding our 'worlds best welfare' spruiking, yet fail to provide veterinary care and oversight to large numbers of animals being forced to endure extreme forms of transport by sea.

Attempts to weaken this by not sending an AAV on every ship would indicate that the departments interests are indeed 'captured', captured by the exporters who do not, and have never wanted an AAV to oversee their consignments and give a list of reasons for the withholding of this critical animal health, welfare and food safety provision. Exporters simply want limited/scant reporting of any issues encountered and to save money.

Not having an AAV on every voyage is a short term financial saving that leaves the trade more vulnerable to poor outcomes and accountability as veterinary issues including animal welfare often go unaddressed and potentially exported into a receiving country or fail to be addressed in a traceback manner in Australia; i.e. poor preparation/ shortcuts taken in vaccination programs, high mortality from preventable diseases such as pneumonia.

## **2) Definition of near and far markets:**

### **Standard 5**

Agree to changing wording from 'near markets' to Short-Haul and 'far markets' to long-haul. However; I do not believe there should be two stocking densities. Cattle need the space they need. Duration of travel should not be considered, these are 'transport situations' that go for days and or weeks, we don't have different registered establishment stocking densities for proposed duration of voyages. The cattle should get a minimum of the space allocated to a long haul voyage. They all stand, turn around (if possible), lie down (if possible), walk (if possible), eat and drink the same regardless of the predetermined length

of their transport, which of course is not a reliable indicator as identified with the extending factors such as tides, congestion, weather, mechanical breakdowns, course deviations for various reasons, and of course potential rejections at intended discharge port.

Rationale: This is an overdue and welcomed change. Losing the absolutely ridiculous definitions of near and Far markets will prevent snollygoster type operators from loading at short haul levels then skipping around a multitude of 'near' ports and having voyage lengths well in excess of 10 days. I cannot believe these terms were ever approved in a legal document. Bravo for fixing this particular farrago.

### **3) The requirement for the contingency plans for escaped livestock-sea**

g) procedures **and provisions** for the recapture of livestock that escape during the loading **and unloading process. 6 portable cattle panels on each cattle ship must be available.**

The recapture of escapees, especially cattle has been a massive problem for AAV's, Stockpeople, cattle themselves, breakable cargo on a wharf/parked vehicles, traffic, any poor person in their path and ostensibly exporters/ship operators for decades. I would guess that there are a hundred if not a thousand fold more escapee cattle during unloading (discharge) in foreign ports than there are upon loading a ship in Australia. This is because of a multitude of reasons, fatigued crew, poorly designed unloading infrastructure, language barriers, poor quality truck gates that often fall open or cannot be shut until the truck is driven some distance forward from the ramp, thereby allowing cattle a large opportunity to escape from the truck/ramps and head off where ever they decide in the port and beyond (We have had to catch cattle twice in a restaurant in Israel for example). Incompatible truck gates to ramp connections or failure to secure/ block gaps has enabled many cattle to escape before getting onto the truck.

For about 15 years I have been asking for all cattle ships to carry about 6 portable cattle panels with pins to enable the isolation and recapture of cattle that are escapees from the ships/trucks. Having the equipment to hold these cattle either as a means of trapping and holding or to surround them to enable them to recover from sedation safely (not wander off, fall into the water or be run over by trucks/ships- all of which happen). To date, recapture , whilst often the fun adrenaline filled highlight of a voyage can be very dangerous to crew, bystanders/ the cattle themselves. Many cattle sustain life threatening injuries or succumb to sedation overdoses as a result of poorly equipped recapture efforts.



1)

Photo 1, source : Dr Lynn Simpson

This animal was an escapee in North Africa, sedated in the concrete breakwater of the port that he became trapped in and returned to trucks like this. He was alive in this picture.



2)

Photo 2, source: Dr Lynn Simpson

This bull escaped a truck/ ramp tried to run away and subsequently fell off the wharf and for a while his head was wedged between the ships hull (full compression weight) and the wharf- Essentially North Africa. In this photo he had a fractured skull and was euthanised upon being lifted from the water by forklift. This is clearly an unacceptable welfare outcome. His mortality and many others are simply reported as 'misadventure', if reported at all as he is already off the ship. The true nature of their demise and suffering is generally poorly relayed to authorities.

3)



Photo 3 source: Dr Lynn Simpson

This bull was one of three that fell from the back of a truck in Israel and had to be recaptured. This guy got stuck in the concrete and rocks of the edge of the wharf which enabled roping and lift, however he sustained much damage to his legs as a result.

4)



Photo 4, source: Dr Lynn Simpson

This bull jumped off a wharf whilst being chased with a ute and a westergun, he tried to swim to Jordan, was intercepted by the Vet swimming in the water and headed back to Israel. The head stockperson and Vet then sedated, roped, and dragged him out of a restaurant, and loaded by hand (with great difficulty) into a box trailer brought in to take him to the quarantine station.

5)



Photo 5, source: Dr Lynn Simpson



Photo 6, source Dr Lynn Simpson

This bull jumped off the wharf whilst people were trying to recapture him during discharge. He evaded a small boat used to try to rope and catch him, headed north in the Mediterranean and was subsequently hit by a container ship. His body was then retrieved by some unknown seafarers overnight and his body was found floating in the water tied up behind our ship the following morning. We then had to remove him from the water and load him for disposal. I suspect death by being run over by a massive container ship is not great. This was a welfare issue that may have been averted if panels were carried.

- Other contingency plans should involve consideration of every ship carrying a tranquiliser gun and having the Head stockperson/ AAV suitably accredited in its use , AND the 'ship' being aware of any restrictions in local legislation upon the use of the gun in a port so as not to start an international incident.
- This is another reason why an AAV should be on every voyage as it is easy to kill an excited, often overheated animal especially in hot conditions with the wrong dose of sedation. The dose will be adjusted by the operator as each case dictates. No two are the same.
- Some form of portable ramp may be considered to better enable a recovered beast to get back onto a ships ramp or truck.
- Many escapees actually die from their 'misadventure' either by direct trauma, breaking a leg in breakwaters and needing euthanasia, being run over by trucks (especially if lying on the ground sedated), developing bloat whilst trussed up sedated with no supervision as discharge continues or simply disappearing out of the port area and ending up in traffic.

## **Penning requirements for horned cattle**

Cattle sourcing and export criteria

### **Standard 1**

#### **1.4.8**

Horns longer than 12 cm should not be approved for routine loading regardless of the direction they grow. What maximum length is going to be considered?

They still get caught in railings and troughs as an animal moves through a ships alleyways or pen or on a truck. Many 'misadventure' mortalities reported from voyages are cattle who have died from a multitude of reasons related to having stuck heads, especially if horned, horned animals are much more difficult to extract from having their heads trapped and are more likely to become trapped. Having long horns also increases the risk of the horns being ripped off and a bloody, painful vascular stump exposed requiring treatment by an AAV or competent stockperson. Remember the bony part of a horn (below the bloody mess) is a non-detachable part of the animals skull. These injuries are an animal welfare issue. They are also very visible and show up repeatedly in media articles about live export.

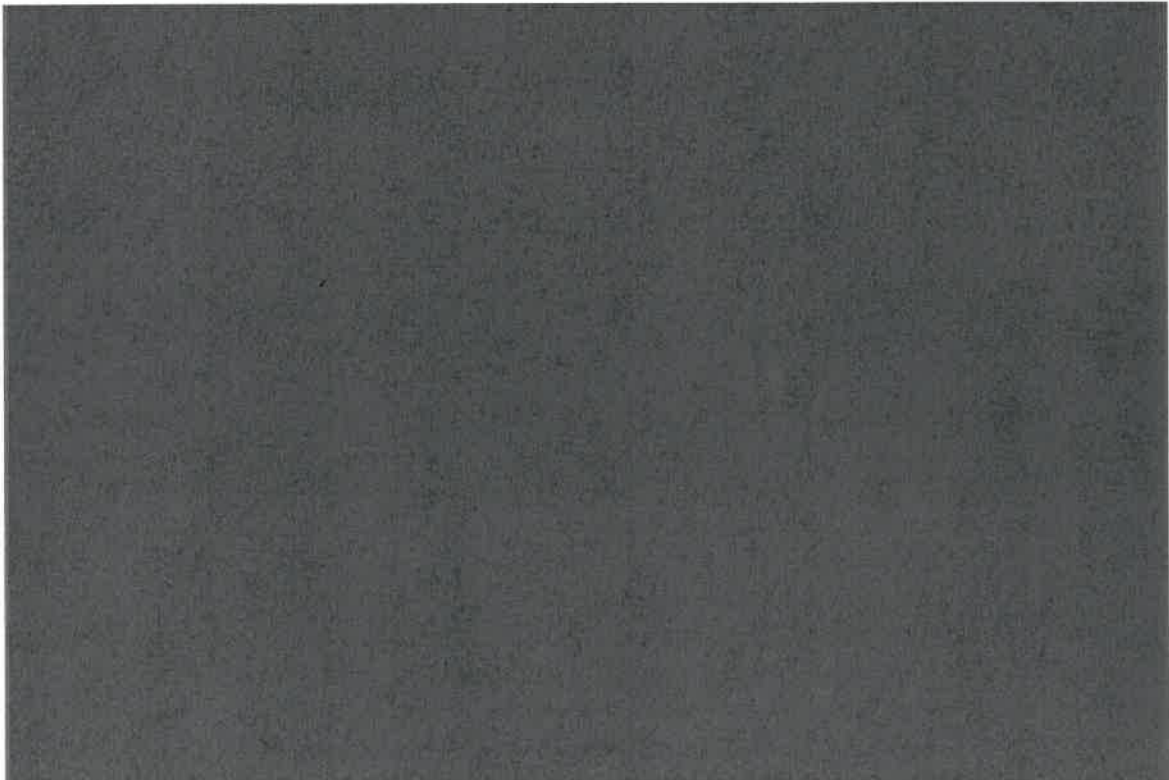


Photo 7, source 'Israel Against Live Shipments'

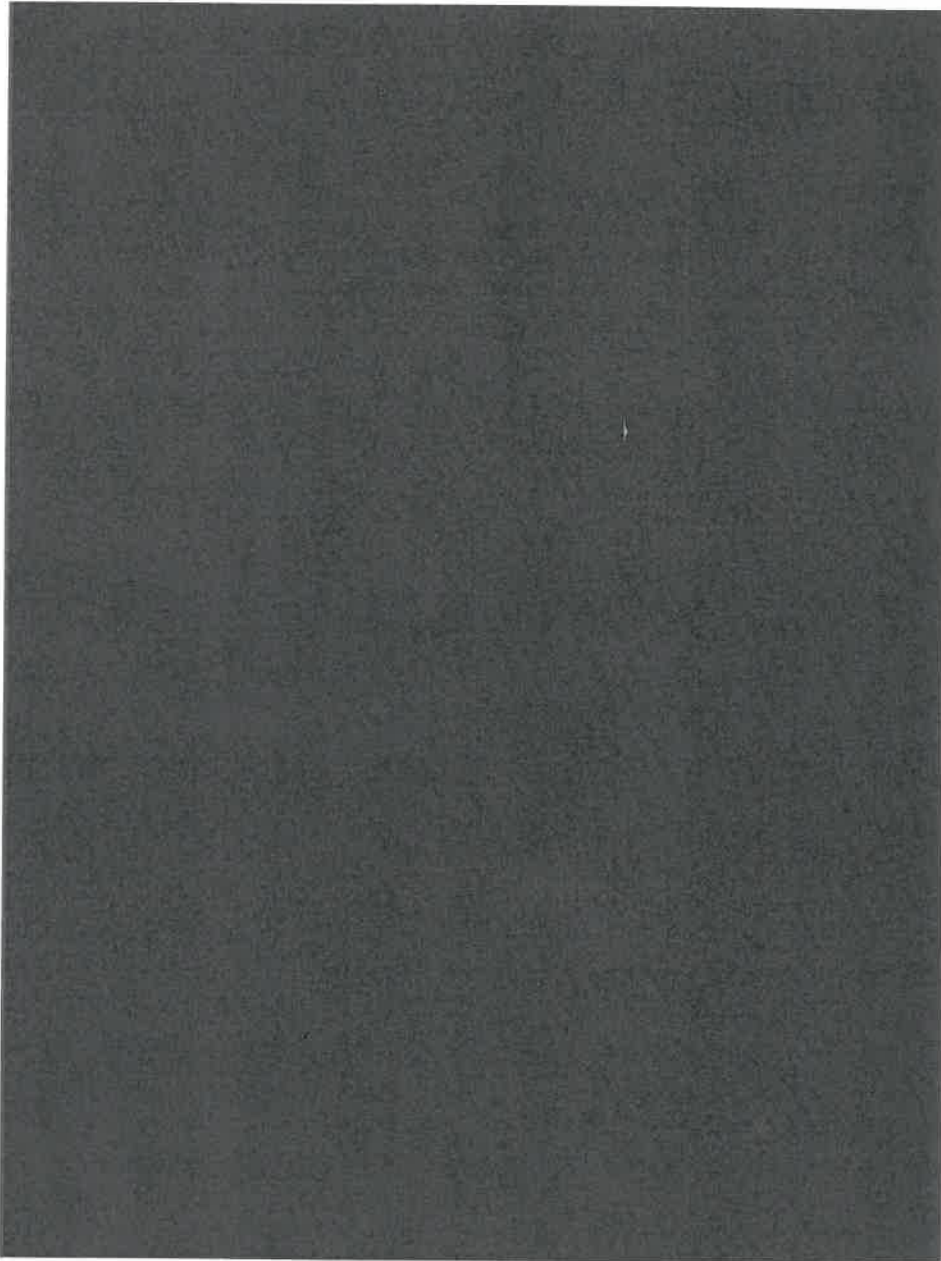


Photo 8, source: 'Israel Against Live Shipments'

Instead of weakening the level of animal welfare in policy and legislation like ASEL it would be more prudent for the government to set standards that farmers are encouraged to meet. Instead of the standards bending to meet poor animal preparation or management.

Many parts of Australia/ individual farms, have very lax animal management standards compared to others. As such they produce animals to the buyer that have not been selected or bred for safer handling, including higher animal welfare parameters such as polled breeds.

Often dehorning of horned animals is done too late resulting in a painful procedure at an age that is illegal without anaesthesia in other parts of the country. And often poorly healed when presented for export thus more risk of infection.

It is very clear from reading familiar station ear tags which animals have come from well managed properties, and those managed with the minimum effort. Why allow this lazy attitude to animal welfare to perpetuate. Downward facing horns are indicative of lazy management- don't encourage it.

Worst case scenarios is that the continued breeding of low hanging horns can result in piercing of the skull when the horn goes unattended.

Not having a market for this poor 'product' should be used as a deterrent to help improve the longer term welfare standard of our national herd.

Do NOT add the new part (b). There is probably some lazy farmer/s lobbying for it, however it would be a step backwards for Australia's Animal Welfare standards. They should be culling animals with misshapen horns not delivering them around the world.



Photo 9, source: uncredited facebook post



Photo 10, source: uncredited facebook post



Photo 11, source You tube image



Photo 12, source: Dr Lynn Simpson

If horns not growing towards the face upon loading can soon be bent that way from blunt impact/ trauma whilst on the ship in tight pens resulting in dramatic facial injuries.

#### **Penning requirements for horned cattle**

##### **Standard 5**

As above, do not allow these cattle with parallel horns onto a ship. And why is there no maximum length of these horns proposed? Asking for trouble for those people having to deal with them on the ships where there is less assistance and more regulatory oversight.

Please cancel proposed Part d) ii)

#### **Table 1 Rejection criteria for all species by sea.**

All proposed changes for horn rejection criteria appear sound except for Point 6: Point 6 is ambiguous and really should be differentiated if it is to stay in a scientifically based legal document:

- 'Horns longer than appropriate for export'

How long is a piece of string? It makes as much scientific sense as the definitions for voyage length to 'Far and Near 'markets. Suggest losing this point altogether, it's embarrassing.

## Penning requirements for horned sheep

Sheep Sourcing and export criteria:

### **Standard 1.7.7:**

Changes to points **a), b), c)**, are all sound and should be adopted.

**Point d)** should be reconsidered. Sheep with even half a full curl are notorious for getting stuck in troughs and railing at sea. They require unhooking often, and often at the expense at some crew members hands getting smashed.

Sheep have been known to suffocate to death as their horn curls get hooked into the end of the fodder delivery pipes and when the fodder comes again if no one is around it suffocates the sheep by smothering their noses in the troughs under pellets and pellet dust.

Also sheep are well known to get their horns hooked around the railings especially on the outside of some pens requiring unhooking- hopefully before the animal collapses and dies hooked up to a head height rail. It is not uncommon to find horned sheep dead and hooked up on an external railing during discharge as they are often overlooked whilst the pen is loaded as they just appear to be another sheep head at the right height, yet the body is limp and hanging dead/ exhausted behind the other sheep in the pen between the crew members and the sheep in question.

In less common instances other sheep have had legs injured (once broken in my experience) from being caught or threaded in the curls of sheep as they try to walk over a horned sheep lying down in crowded pens.

This is another case of farmers not preparing their sheep properly during their farm management, especially if they are destined to intensive penning on a ship

Certainly do not approve more than one curl. Half is more than enough to deal with at sea in large numbers.



Photo 13, source: Dr Lynn Simpson

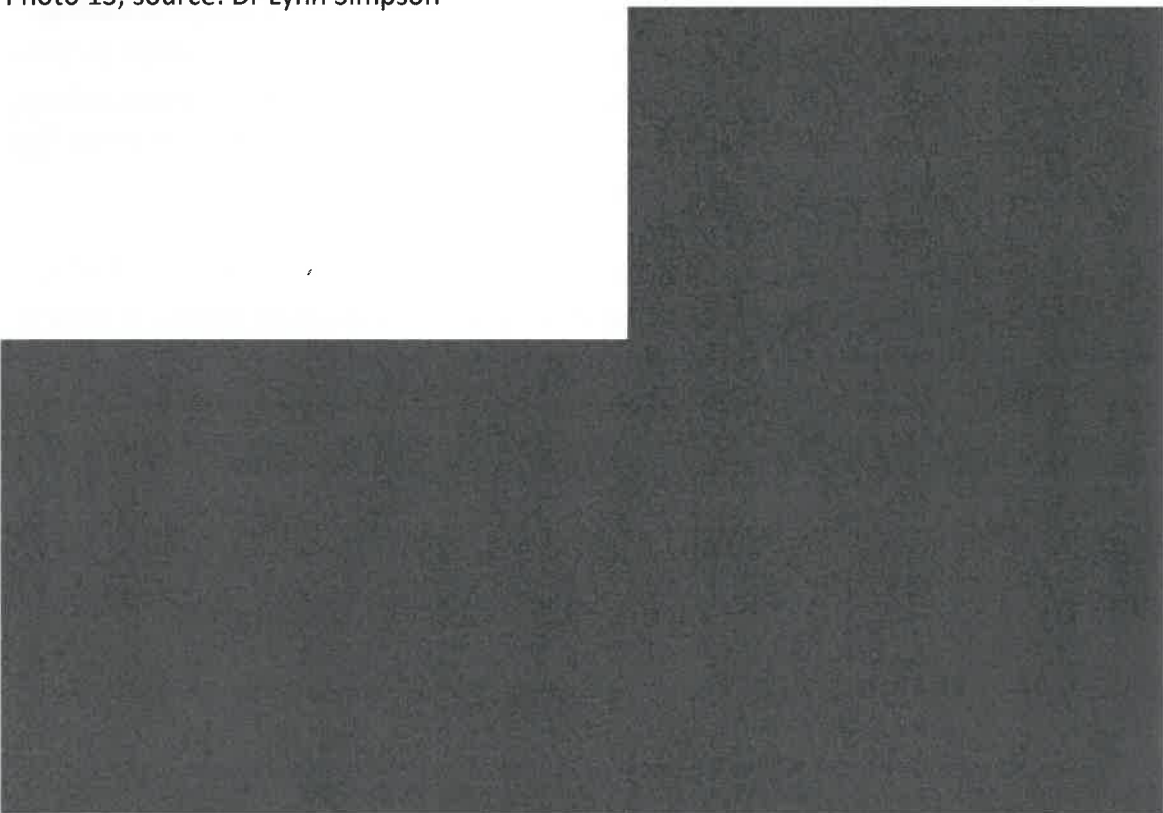


Photo 14, source : anonymous facebook post

Photo 15, source Alamy internet image

Whilst these images are in fencing, similar fates are encountered with railings on ships, often resulting in death or injured hands of crew.

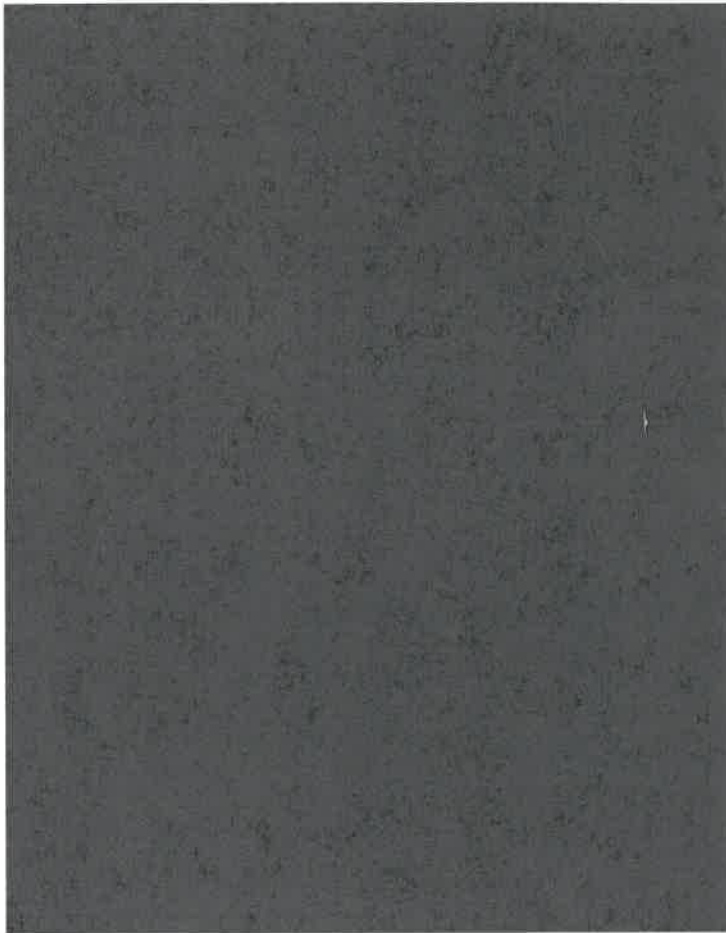


Photo 16, source: uncredited internet image

This goat could easily represent a sheep at sea caught in railings. The end result to this type of entrapment (so as not to have your hands smashed) is often using a car jack to pry the bars apart or getting a grinder to cut the bars away to enable freeing of the animal. Stressful for the animal and an unnecessary extra problem for the crew.

### **Sheep loading and management requirements**

#### **Standard 5.5.1**

**d)** do not approve full curl sheep and certainly not mixed with poll sheep. Again, enabling lazy farming/ management and lazy buyers and lazy or frustrated preparation at the registered premises.

**e)** If allowing long horns under special permission for a breeding purpose for example allow at least additional 10% of current space allowance but only in limited small numbers in readily observable pens to enable better management by crew, hopefully reducing injuries and deaths.

- Ideally do not allow any full curled horns on a ship ever again. The risk of predictable entrapment is too high.

### **Table 1 Rejection criteria for all species by sea**

All proposed changes for horn rejection criteria appear sound except point 6.

**Point 6** however is ambiguous and really should be differentiated if it is to stay in a scientifically based legal document:

- 'Horns longer than appropriate for export'

How long is a piece of string? It makes as much scientific sense as the definitions for voyage length to 'Far and Near' markets. Suggest losing this point altogether, it's embarrassing. These definitions are very 'monty pythonesque', or 'Clarke and Daws', funny but absurd.

### **Clarifying livestock identification requirements in laboratory test reports- sea**

Nice- thorough and sensible. Thank you.

### **Rejection criteria table- sea**

#### **External/Skin:**

**Sheep wool or hair longer than 25 mm.**

This is mandatory as it addresses one of the biggest mortality risks in live export- Heat stress. I am glad to see it here, however it was in earlier versions. I hope it's removal was an accident?

#### **Head:**

Agree with horn rejection points proposed

### **Reserve Fodder requirements**

**5.1.15** To manage daily feed requirements when a voyage experiences a delay.

'An additional 20% or **2** days of reserve feed, whichever is greater, must be loaded on the vessel.

Brilliant, about time feed shortages are addressed properly, however reducing the already in place 3 day requirement is asking for trouble with short and middle length voyages. Please make it '20% or 3 days' whichever is greater. It is an animal welfare tragedy and a nightmare watching animals starve, weaken and die in front of your eyes on a multi-million dollar floating feedlot in the middle of the ocean with no access to replenish supplies.

The overestimation of voyage days comes as no surprise. Enables less ethical exporters to load/pay for, less fodder at the risk of animals going hungry/dying, and stressing ship crews. A possible reason for why the mv gulf livestock risked sailing through typhoon Maysak at the cost of total loss bar 2 of 43 crew and all cattle. Possibly forced by lack of fodder provisions.

Options 1 and 2 are substandard for animal welfare, compared to the proposed rewording in red. Keep the red writing please.

- I like the idea of the RVL- Recommended Voyage Length. I think this should be introduced as a mandatory part of the NOI so as to be included in writing and as a reminder to all involved how long provisions such as fodder are needed for.
- I also believe that the ASEL recommended ration in body weight percentage for dairy cattle needs to be increased to at least 3%. Dairy cattle are notoriously hungry on a ship and whilst ad lib is probably not the answer ore is needed as they become very pushy at feed time often resulting in the trampling or shy feeding of many others in their way. This has been a problem for decades.

## **Livestock marking and isolation practices in registered establishments**

(establishments- sounds like they are being held in a pub?)

### **3.1.15 e) point 5**

‘Where an animal is not suffering distress or does not have an infectious or contagious disease, the animal should be isolated upon identification or at the first reasonable opportunity’

This line does not make much sense, all the others are to be isolated yet this ‘animal’ would be the balance of healthy animals. Is it simply meant to imply that healthy animals should be kept in a separate group away from all distressed/ diseased animals?

Otherwise all other recommendations in red are good.

### **Add to definitions:**

Possibly add a maximum timeline like ‘no longer than 12 hours’? This could enable an event to occur after a days work finishes and is not found until the next days work commences? And mean some unaware worker not suffer any unfair reprisal.

Assuming urgency and knowledge of a requirement do not always correlate unless there is 24/7 monitoring, ie a broken leg for example.

I have found experienced feedlot operators allow reject animals to walk around with broken legs and severe illnesses for multiple days whilst waiting for a reject truckload for the doggers, I had to insist on immediate euthanasia upon finding them. And these discoveries were made with an official delegation visit including the CVO of Australia and senior RSPCA delegate- clearly this stuff needs clarity for compliance.

## **The Number of clear days livestock spend in a registered Establishment**

(still sounds like a pub- I'm picturing drunk cattle playing pool)

All recommendations in red appear to improve clarity and are welcomed.

## **Record keeping requirements for registered establishments**

I agree with all recommendations in red.

I would add that a simplified copy/report, of any issues/ mortality numbers and causes observed in the registered establishment for a particular consignment be given to the shipboard AAV/ Head stockperson at the pre sailing meeting so they know what they may have to look out for in case a line of stock or a specific pathogen is causing an as yet unrecognised/ unobserved issue in animals to be loaded.

## **Rejection criteria-Air**

Changes to Head section appears sound, except for the silly ' horns longer than appropriate for export'...

Sincerely

Dr Lynn Simpson  
BSc, BVMS, MVSc  
Ex shipboard AAV